

Exhibit D

From: Bacon, Chris
Sent: Tuesday, October 29, 2019 9:11 AM
To: Alfonso Kennard
Subject: FW: Executed Agreement
Attachments: Firm W-9.pdf; Executed Settlement Agreement- Wallace and Morgan.pdf

Alfonso:

I appreciate you getting two of the plaintiffs to sign. Please explain to Ms. Morgan and Mr. Wallace that we will not be making any payments until Debbie signs the agreement or the Court enters an order finding that there is a valid agreement. After all, our agreement is contingent on us not having to litigate any of the claims. Ultimately, I am pretty confident that the court will find that there is a valid agreement. However, this is likely to delay any payments.

My intention at this point in time is to give Debbie a few more days before I purchase the various transcripts and file a motion. While I realize that Debbie is not communicating with you, you may want to send her a letter advising her that I do intend to seek attorney's fees from her if I am forced to file a motion.

Chris

From: Fransheska Romero <fransheska.romero@kennardlaw.com>
Sent: Tuesday, October 29, 2019 8:58 AM
To: Bacon, Chris <cbacon@velaw.com>
Cc: Alfonso Kennard <alfonso.kennard@kennardlaw.com>; Sonia Gonzalez <sonia.gonzalez@kennardlaw.com>
Subject: Executed Agreement

Mr. Bacon,

Attached is the executed Settlement Agreement by Mr. Wallace and Ms. Morgan, along with the Firm's W-9.

Thank you,

 Fransheska Romero

Case Manager



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